

1 ADAM PAUL LAXALT  
Attorney General  
2 VIVIENNE RAKOWSKY  
Deputy Attorney General  
3 Nevada Bar No. 009160  
555 E. Washington Avenue  
4 Suite 3900  
Las Vegas, Nevada 89101  
5 (702) 486-3103  
6 (702) 486-3416 (fax)  
VRakowsky@ag.nv.gov  
7 PETER KEEGAN  
Deputy Attorney General  
8 Nevada Bar No. 12237  
100 N. Carson Street  
9 Carson City, Nevada 89701  
10 (775) 684-1153  
(775) 684-1156 (fax)  
11 PKeegan@ag.nv.gov  
*Attorneys State Defendants*  
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14 UNITED STATES DISTRICT COURT  
15 DISTRICT OF NEVADA

16 HELEN ARMSTRONG,  
17 Plaintiff(s),

18 vs.

19 TERRY REYNOLDS, in his individual capacity  
and as Deputy Director of Nevada Department  
20 of Business and Industry; STEVE GEORGE, in  
his individual capacity and as an Administrator  
21 of the Nevada Division of Industrial Relations;  
JESS LANKFORD, in his individual capacity  
22 and as Chief Administrative Officer of Nevada  
OSHA; and LARA PELLEGRINI, in her  
23 individual capacity and as Whistleblower Chief  
Investigator of Nevada OSHA; DOES I through  
24 X, unknown individuals, and ROES XI through  
XX, entities, government agencies, corporations,  
25 or other companies and/or businesses currently  
unknown,

26 Defendant(s).

Case No. 2:17-cv-02528-APG-CWH

**ORDER**

27 **STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFFS**  
28 **OPPOSITION TO DEFENDANTS MOTION TO DISMISS COMPLAINT**

1 IT IS HEREBY STIPULATED AND AGREED by and between DEFENDANTS  
2 **TERRY REYNOLDS**, Deputy Director of Nevada Department of Business and Industry; **STEVE**  
3 **GEORGE**, Administrator of the Nevada Division of Industrial Relations; **JESS LANKFORD**, Chief  
4 Administrative Officer of Nevada OSHA; and **LARA PELLEGRINI**, Whistleblower Chief Investigator  
5 of Nevada OSHA (collectively the "State Defendants"), by and through counsel, Adam Paul Laxalt,  
6 Attorney General, Deputy Attorney General Vivienne Rakowsky, Deputy Attorney General  
7 Peter Keegan, and PLAINTIFF **HELEN ARMSTRONG**, by and through counsel, Joel F.  
8 Hansen of Cooper Levenson, P.A., that:

- 9 1) If Plaintiff's Leave to File Amended Complaint (ECF No. 45) is not granted, the  
10 Parties agree that the State Defendants' Reply to Plaintiff's Opposition to  
11 Defendants' Motion to Dismiss Complaint (ECF No. 44) will not be due until 30  
12 days after the Court files its Order denying Plaintiff's Motion for Leave to File  
13 Amended Complaint (ECF No. 45);
- 14 2) If Plaintiff's Leave to File Amended Complaint (ECF No. 45) is granted, the  
15 Parties agree that the State Defendants' response to the Amended Complaint will  
16 not be due until 30 days after the Amended Complaint is filed.
- 17 3) If Plaintiff's Leave to File Amended Complaint (ECF No. 45) is granted and State  
18 Defendants file a Motion to Dismiss Amended Complaint, the Parties agree that  
19 the Plaintiff will have 30 days to respond after a Motion to Dismiss Amended  
20 Complaint is filed.

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1 Good causes exists to extend the date for the Defendants' brief in Reply to Plaintiffs  
2 Opposition to Defendants' Motion to Dismiss (ECF No. 44) pending the outcome of the  
3 Plaintiffs Motion for leave to file an amended Complaint. (ECF No.45). If this Court grants  
4 the Plaintiff's Motion for Leave, the Amended Complaint would supersede the original  
5 Complaint and the Defendants would need adequate time to respond to the Amended  
6 Complaint.

7 This Stipulation is entered into this 1st day of February, 2018.

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9 **COOPER LEVENSON, P.A.**

10 /s/ Joel F. Hansen

11 **JOEL F. HANSEN, ESQ.**

12 Nevada Bar No.: 1876

13 1835 Village Center Circle

14 Las Vegas, Nevada 89134

(702) 366-1125

*Attorneys for Plaintiff*

**ADAM PAUL LAXALT, Attorney General**

/s/ Vivienne Rakowsky

**VIVENNE RAKOWSKY, DAG**

Nevada Bar No.: 009160

555 E. Washington Avenue, Suite 3900

Las Vegas, Nevada 89101

(702) 486-3103

*Attorneys for Defendants*

**ORDER**

**IT IS SO ORDERED.**

Dated: February 2, 2018,



UNITED STATES DISTRICT COURT JUDGE